

EXHIBIT B

EXHIBIT B**PLAINTIFFS' REQUESTS FOR PRODUCTION SERVED ON APRIL 3, 2024
SEEKING DISCOVERY-ON-DISCOVERY**

RFP	Text of RFP
RFP No. 119	Unredacted versions of the following docket filings, and any attachments to these filings, in Epic v. Google: Dkts. 313, 335, 346, 373, 378, 441.
RFP No. 121	All document retention or preservation policies, practices, procedures, guidance, and periods applicable to Chats from January 1, 2018 to the present.
RFP No. 122	All litigation hold policies, practices, procedures, or guidance applicable to Chats from January 1, 2018 to the present.
RFP No. 123	All documents, trainings, policies, procedures, practices, presentations, slideshows, videos, guidance, or other similar documents regarding employees' use of Chats, including but not limited to the "history on" and "history off" settings, from January 1, 2018 to the present.
RFP No. 124	All communications by employees regarding Chats' "history on" and "history of" setting from January 1, 2018 to the present.
RFP No. 125	All Communicate with Care policies or trainings effective or used from January 1, 2018 to the present.
RFP No. 126	Any litigation hold(s) or hold notice(s) issued to any custodian, deponent, or person likely to have discoverable information identified in this matter from January 1, 2018 to the present.
RFP No. 127	Any litigation hold reminder(s) issued to any custodian, deponent, or person likely to have discoverable information identified in this matter from January 1, 2018 to the present.
RFP No. 128	Any policies, procedures, or practices Google uses or employs to insure that employees are complying with its document retention or preservation policies and/or a litigation hold from January 1, 2018 to the present.
RFP No. 129	All policies, practices, and procedures for the retention and security of Chats and the disposal of non-retained Chats.

RFP	Text of RFP
RFP No. 130	Any declarations, affidavits, or deposition transcripts (or excerpts) that were submitted as or attached to a docket filing in Epic v. Google or in U.S. v. Google regarding or related to Chats or a motion for sanctions against Google.
RFP No. 131	Any interrogatories answered by Google in Epic v. Google or U.S. v. Google regarding or related to Chats, document preservation, or a motion for sanctions against Google.
RFP No. 132	All communications by employees regarding litigation holds and/or document retention policies related or applicable to Chats from January 1, 2018 to the present.
RFP No. 133	The “system-wide backend log” referenced in the Court’s minute order in Dkt. 380 (pg. 2) in Epic v. Google as well as documents sufficient to show the explanation of
RFP No. 134	Any Chats produced in response to the Court’s minute order in Dkt. 391 in Epic v. Google.
RFP No. 135	All communications regarding the use of different retention policies for different versions of Chats.